

EXHIBIT C

CONFIDENTIAL



Transcript of Karen Slaven

Friday, April 8, 2022

*National Coalition on Black Civic Participation, et al.
v. Jacob Wohl, et al.*

www.trustpoint.one
www.alderstonreporting.com
800.FOR.DEPO (800.367.3376)
Scheduling@Trustpoint.One

Reference Number: 115990

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK
3 -----X

4 NATIONAL COALITION ON BLACK CIVIC
5 PARTICIPATION, MARY WINTER, GENE STEINBERG,
6 NANCY HART, SARAH WOLFF, KAREN SLAVEN, KATE
7 KENNEDY, EDA DANIEL, AND ANDREA SFERES,
8 Plaintiffs,
9 Civil Action No.:
10 20-cv-8668 (VM)(OTW)

11 People of the STATE OF NEW YORK, by its
12 attorney general, LETITIA JAMES, ATTORNEY
13 GENERAL OF THE STATE OF NEW YORK,

14 v.

15 JACOB WOHL, JACK BURKMAN, J.M. BURKMAN &
16 ASSOCIATES, LLC, PROJECT 1599, MESSAGE
17 COMMUNICATIONS, INC., ROBERT MAHANIAN, and JOHN
18 and JANE DOES 1-10,

19 Defendants.
20 -----X

21 April 8, 2022
22 3:48 p.m.
23

24 REMOTE CONFIDENTIAL EXAMINATION BEFORE
25 TRIAL of KAREN SLAVEN, the Plaintiffs in the
above-entitled action, taken on behalf of the
Defendants, held at the above date and time,
and taken before Dorene Glover, an RSR Reporter
and Notary Public within and for the State of
New York.

26

27

28

29

30

1 A P P E A R A N C E S:

2

3 ORRICK, HARRINGTON & SUTELIFFE
4 Attorneys for Plaintiffs
5 51 West 52nd Street
6 New York, New York 10019
7 BY: AARON GOLD, ESQ.
RYAN LIND, ESQ.

8

9 GERSTMAN SCHWARTZ, LLP.
10 Attorneys for Defendants
11 60 East 42nd Street
12 New York, New York 10165
13 BY: RANDY KLEINMAN, ESQ.
DAVID SCHWARTZ, ESQ.

14

15 LAWYERS' COMMITTEE FOR CIVIL RIGHTS UNDER LAW
16 1500 K Street, NW
17 Washington, DC 20005
18 BY: DAVID BRODY, ESQ.

19

20 NYS Office of Attorney General
21 Attorneys for Defendants
22 28 Liberty Street
23 New York, New York 10005
24 BY: RICK SAWYER, ESQ.
COLLEEN FAHERTY, ESQ.

25

1 Q. Where do you work?
2 A. Key Bank.
3 Q. What do you do for them?
4 A. I'm a data analyst programmer.
5 Q. How long have you been doing that
6 for?
7 A. With Key Bank.
8 Q. Yes.
9 A. Since 1997, I believe.
10 Q. What is your race or ethnicity?
11 A. Caucasian.
12 Q. What are your current policy
13 affiliations?
14 A. What I'm registered as?
15 Q. Okay, that's one question.
16 A. I'm registered as a democrat.
17 Q. So is it fair to say you are
18 registered to vote?
19 A. Correct.
20 Q. What is your vote or registration
21 address?
22 A. My home address.
23 Q. How long have you been registered
24 as a democrat for approximately?
25 A. 35 years, 40 years.

1 Q. Did you vote in the 2020
2 presidential election?

3 A. Yes.

4 Q. Did you vote in person or by mail?

5 A. I voted early. I don't remember if
6 it was in person or at the board of elections
7 or if it was by mail. I do one or the other
8 most times.

9 Q. How did you deliver the ballot?

10 A. I'm not sure if I mailed that
11 particular election or I went down and voted
12 early at your board of elections.

13 Q. Have you ever voted in person for
14 any federal, state or local election in the
15 past?

16 A. Yes, I have.

17 Q. Did you -- have you ever voted in
18 person after the 2020 presidential election?

19 A. Only early vote in person, early
20 vote.

21 Q. That's the same method you were
22 describing earlier?

23 A. Yes.

24 Q. Who did you vote for in the 2020
25 presidential election?

1 A. Biden.

2 Q. So you were happy with the outcome
3 of the election?

4 A. Yes.

5 Q. What if anything do you do to
6 support the Black community?

7 MR. GOLD: Objection.

8 A. I'm not sure what you mean by
9 support them.

10 Q. Do you belong to any groups that do
11 any type of civic work geared toward the Black
12 community?

13 A. I don't think so.

14 Q. Are you involved locally with any
15 type of political club or organization?

16 A. I am.

17 Q. Which one?

18 A. Cleveland stonewall democrats. The
19 Kya Hota democratic woman's Caucus.

20 Q. Anything else?

21 A. Human Rights Campaign. I think
22 that's it for political affiliations.

23 Q. What is the Kya Hota County Women's
24 Counsel?

25 A. It's one of the democratic

1 MR. GOLD: Objection.

2 A. It's my opinion based on who I know
3 received the call and who I know that did not.

4 Q. Who do you know that received the
5 call?

6 A. A lot of people in East Cleveland.

7 Q. Specifically who?

8 A. Our house, Eda's house. I heard
9 other people talking about it at meetings. I
10 know it was hit in East Cleveland.

11 Q. The people that you heard talking
12 about it at the meetings, did any of them --
13 are any of them members of a minority
14 community?

15 A. Yes.

16 Q. Have you personally spoken to
17 anyone in the Black community who received this
18 call?

19 A. No.

20 Q. Why not?

21 A. I just haven't.

22 Q. You were angered by it, though?

23 A. Yes.

24 Q. You thought it was designed to
25 target the Black community, why didn't you

1 in any way?

2 A. I think the idea that policemen
3 might show up at your door and knock on a door
4 for a warrant gives a threat that there might
5 be physical confrontation.

6 Q. Could that not happen if you have a
7 pending warrant anyway?

8 MR. GOLD: Objection.

9 A. I imagine it could.

10 Q. Is it your testimony at that --
11 withdrawn.

12 Do you think that you are more
13 intelligent than members of the Black
14 community?

15 MR. GOLD: Objection. Harassing
16 question.

17 A. Certainly not.

18 Q. Have you personally spoken to any
19 member of the Black community who claims to
20 have been intimidated by the Robocall?

21 MR. GOLD: Objection. Asked and
22 answered.

23 A. I said I didn't have any specific
24 conversations to point to.

25 Q. Not even as a canvasser?